

January 12, 2018

Via ECFS

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-A325  
Washington, DC 20554

**Re: Section 63.71 Application of Level 3 Telecom of D.C., LLC and Level 3  
Telecom of Maryland, LLC**

Dear Ms. Dortch:

Enclosed is a Section 63.71 discontinuance application for Level 3 Telecom of D.C., LLC (FRN: 0017-3480-38) and Level 3 Telecom of Maryland, LLC (FRN: 0017-3482-02). The application seeks Commission approval for the discontinuance of certain voice services (as more fully described in the application) in the Washington, DC and Laurel and Baltimore, Maryland metropolitan areas. A separate notice of this discontinuance is being filed with the International Bureau pursuant to Section 63.19 of the Commission's rules. No other services are being discontinued by the applicant at this time.

In the event there are questions concerning this matter, please contact me.

Very truly yours,



R. Edward Price  
Senior Counsel, International  
Regulatory Affairs

Enclosure

cc (w/encl.): Rodney McDonald (by email)  
Kimberly Jackson (by email)

200 Meridian Centre Blvd.  
Suite 130  
Rochester, NY 14618  
(585) 255-1227  
ted.price@centurylink.com  
www.centurylink.com

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

\_\_\_\_\_  
In the Matter of )  
Section 63.71 Application of )

**Level 3 Telecom of D.C., LLC** )  
**Level 3 Telecom of Maryland, LLC** )

WC Docket No. \_\_\_\_\_

)  
For Authority Pursuant to Section 214 of )  
the Communications Act of 1934, as )  
amended, to Discontinue the Provision of )  
Certain Voice Services in the Washington, )  
DC and Laurel and Baltimore, Maryland )  
Metropolitan Areas )  
\_\_\_\_\_

**SECTION 63.71 APPLICATION OF  
LEVEL 3 TELECOM OF D.C., LLC AND LEVEL 3 TELECOM OF MARYLAND, LLC**

Level 3 Telecom of D.C., LLC (FRN: 0017-3480-38) and Level 3 Telecom of Maryland, LLC (FRN: 0017-3482-02) (collectively, “Applicant”), subsidiaries of Level 3 Communications, LLC, which is now a CenturyLink company, seek authorization pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission’s rules, 47 C.F.R. § 63.71, to discontinue provision of certain voice services (as more fully described below) in the Washington, DC and Laurel and Baltimore, Maryland metropolitan areas.

Applicant provides the following information pursuant to Section 63.71 of the Commission’s Rules:

1. Name and Address of the Carrier: Level 3 Telecom of D.C., LLC and Level 3 Telecom of Maryland, LLC, 1025 Eldorado Boulevard, Broomfield, Colorado 80021.

2. *Date of Planned Service Discontinuance:* Applicant plans to discontinue the affected services on or around April 15, 2018, or as soon thereafter as any necessary regulatory approvals are obtained.

3. *Points of Geographic Areas of Service Affected:* Applicant proposes to discontinue the affected service in the Washington, DC and Laurel and Baltimore, Maryland metropolitan areas.

4. *Description of Services Affected:* The following services are being discontinued:

- **Analog PBX Trunk Service** provides a voice-grade telephonic communications channel that can be used to place or receive one call at a time.
- **Basic Business Line Service** provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.
- **Business Terminals Service** provides a physical appearance in the switch and is assigned to a unique channel.
- **Channel 12 Service** is a bundled service consisting of local exchange service with select features.
- **Complete Lines/Trunks Service (a/k/a Complete Lines DS0)** provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.
- **Complete T Service** is a bundled service consisting of local exchange service with select features.
- **Digital PBX Trunk Service** provides a DS1 connection between customer-provided PBX equipment or trunk-capable key systems and the Applicant's switch.

- **Primary Rate ISDN (PRI) Service** allows a connection between ISDN Customer Premises Equipment and Applicant's switching equipment using a Primary Rate Interface over a digital transport facility.
- **VersiPak IPRI Service** is an integrated, packet-based access solution designed to deliver PRI and Internet services over a single DS1.
- **VersiPak Lines and Trunks Service** is the voice portion of an integrated, multi-service, packet-based access service that delivers voice and data services over a single DS1.
- **VersiPak Mach2 Service and VersiPak Mach3 Service** consist of integrated voice and Internet bandwidth.
- **VersiPak Flex® T Service and VersiPak Power® T Service** are bundled services consisting of local exchange service with select features.

5. *Brief Description of the Dates and Methods of Notice to All Affected Customers:* Applicant sent a written notification of the planned discontinuance to customers utilizing the services in accordance with Section 63.71(a) of the Commission's Rules. Customer notifications were sent by United Parcel Service on January 12, 2018. A copy of the notification is attached to this application.

6. *Whether the Carrier is Considered Dominant or Non-dominant with Respect to the Service to be Discontinued:* Applicant is considered non-dominant with respect to the services to be discontinued.

7. *Other information:* In accordance with Section 63.71(a) of the Commission's Rules, a copy of this application is being mailed concurrently with its filing to the entities listed on the attached certificate of service. Please direct questions regarding this application to the undersigned.

Conclusion: The public convenience and necessity will not be adversely affected by the discontinuance of the services described herein. Advance notice has been provided to all affected customers, giving them ample time to arrange substitute services, which are readily available and include, but are not limited to, other services offered by Applicant and its affiliates, Level 3 Communications, LLC and CenturyLink. Therefore, Applicant respectfully requests that the Commission approve this Section 63.71 application.

Respectfully submitted,



---

R. Edward Price  
Senior Counsel International Regulatory Affairs  
CenturyLink  
200 Meridian Centre Boulevard, Suite 130  
Rochester, NY 14618  
(585) 255-1227  
ted.price@centurylink.com

January 12, 2018

## Customer Notice

1025 Eldorado Boulevard  
Broomfield, CO 80021

January 12, 2018

Service Address: [<<Service Address>>]

### **Important Notice Regarding the Planned Discontinuance of Certain Traditional Voice Services Provided by Level 3 Telecom of D.C., LLC and Level 3 Telecom of Maryland, LLC (collectively “Level 3”)**

Dear Customer,

This letter serves as formal notice that certain voice services provided by Level 3, a CenturyLink company, to your company and throughout the Washington, DC and Laurel and Baltimore, MD metropolitan areas by Level 3 Telecom of D.C., LLC and Level 3 Telecom of Maryland, LLC will be discontinued on or after April 15, 2018, provided that the Federal Communications Commission (“FCC”) approves the planned discontinuance.

**You are receiving this notice because you currently subscribe to one or more of the following services, which, subject to the approval of the FCC, will be discontinued as a result of the planned decommission of Level 3 voice switches.**

- **Analog PBX Trunk Service** provides a voice-grade telephonic communications channel that can be used to place or receive one call at a time.
- **Basic Business Line Service** provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.
- **Business Terminals Service** provides a physical appearance in the switch and is assigned to a unique channel.
- **Channel 12 Service** is a bundled service consisting of local exchange service with select features.
- **Complete Lines/Trunks Service (a/k/a Complete Lines DS0)** provides voice-grade telephonic communications channels that can be used to place or receive one call at a time.
- **Complete T Service** is a bundled service consisting of local exchange service with select features.
- **Digital PBX Trunk Service** provides a DS1 connection between customer-provided PBX equipment or trunk-capable key systems and the Level 3 switch.
- **Primary Rate ISDN (PRI) Service** allows a connection between ISDN Customer Premises Equipment and Level 3 switching equipment using a Primary Rate Interface over a digital transport facility.
- **VersiPak IPRI Service** is an integrated, packet-based access solution designed to deliver PRI and Internet services over a single DS1.
- **VersiPak Lines and Trunks Service** is the voice portion of an integrated, multi-service, packet-based access service that delivers voice and data services over a single DS1.
- **VersiPak Mach2 Service and VersiPak Mach3 Service** consist of integrated voice and Internet bandwidth.
- **VersiPak Flex® T Service and VersiPak Power® T Service** are bundled services consisting of local exchange service with select features.

In order to maintain continuous service at your location following the proposed discontinuance, CenturyLink would like to work with you to migrate your existing service to our next-generation, state-of-the-art platform that will provide your business with greater flexibility, simplicity, and efficiency. Please contact me as soon as possible to ensure a seamless and uninterrupted transition of your voice service.

If you have not made arrangements with CenturyLink or another telecommunications service provider to replace your voice service listed above prior to April 15, 2018, please be advised that your service will be disconnected on or after April 15, 2018, provided that the FCC approves the planned discontinuance.

We understand that this is an inconvenience, and we are confident that our team can seamlessly manage the entire process to provide your business with a better communications solution.

If you also subscribe to other services from CenturyLink, those services will NOT be impacted by the anticipated discontinuance of the affected services. Your other services will remain in place with no change to the applicable rates, terms, or conditions.

We would like to work with you immediately to update your service and continue our valued relationship, so please contact me as soon as possible to discuss our migration plan.

Sincerely,

On behalf of CenturyLink and its affiliated companies.

<<Account Owner Name>>

<<Account Owner Phone>>

<<Account Owner email>>

**Level 3 Telecom of D.C., LLC and Level 3 Telecom of Maryland, LLC are required by the FCC to provide the following statement:**

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Level 3 Telecom of D.C., LLC and Level 3 Telecom of Maryland, LLC. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

**CERTIFICATE OF SERVICE**

I, Tammy Chatfield, do hereby certify that on this 12th day of January, 2018, I caused to be served a true and correct copy of the foregoing Section 63.71 Application of Level 3 Telecom of D.C., LLC and Level 3 Telecom of Maryland, LLC to be sent via first-class U.S. Mail, postage prepaid, to the following:


Secretary of Defense  
Attn: Special Assistant for Telecommunications  
Pentagon  
Washington, DC 20301

Commission Secretary  
Public Service Commission of the District of Columbia  
1333 H Street NW, Suite 200W  
Washington, DC 20005

Executive Secretary  
Maryland Public Service Commission  
6 St. Paul Street  
Baltimore, Maryland 21202-6808

Executive Office of the Mayor  
1350 Pennsylvania Ave., NW  
Suite 316  
Washington, DC 20004

Governor of Maryland  
State Capitol Building  
Annapolis, MD 21401

  
\_\_\_\_\_  
Tammy Chatfield